

Magistrate Judge Brian A. Tsuchida

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

V.

Jaspal GILL, aka, Rajinder Pal SINGH,

Defendant.

CASE NO. MJ22-224

COMPLAINT for VIOLATION

Title 8, United States Code,
Sections 1324(a)(1)(A)(v)(I), (ii), and (iii),
and 1324(a)(1)(B)(i)

BEFORE, Brian A. Tsuchida, United States Magistrate Judge, U. S. Courthouse,
Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

Conspiracy to Transport and Harbor Certain Aliens for Profit

Beginning on or about an unknown date, and continuing until May 20, 2022, in Whatcom, King, and Thurston Counties, within the Western District of Washington, and elsewhere, Jaspal GILL, and others known and unknown, did knowingly and intentionally conspire to transport and move certain aliens, who had entered, and remained in the United States in violation of law, within the United States by means of transportation and otherwise, in furtherance of such violation of law, and to conceal, harbor and shield from

1 detection by immigration authorities such aliens, with the intent to violate the law, for the
2 purpose of commercial advantage or private financial gain.

3 All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (ii),
4 and (iii), and 1324(a)(1)(B)(i).

5 And the complainant states that this Complaint is based on the following
6 information:

7 I, David J. Spitzer, being first duly sworn on oath, depose and say:

8 **INTRODUCTION AND AGENT BACKGROUND**

9 1. I am a Special Agent with United States Homeland Security Investigations
10 (HSI) and have been so employed since January 2020. In February 2021, I graduated from
11 the Criminal Investigator Training Program and the Homeland Security Investigations
12 Special Agent Training Program at the Federal Law Enforcement Training Centers
13 (FLETC) in Glynco, Georgia. While at FLETC, I received nearly 1000 hours of training in
14 such areas including, but not limited to criminal law, human smuggling/trafficking
15 investigations, and criminal procedures. Prior to being employed with HSI, I was employed
16 as an agent with the United States Border Patrol (USBP) for eleven years and was assigned
17 to the Sector Intelligence Units in El Centro, CA, and Blaine, WA. In this capacity, I was
18 responsible for conducting criminal investigations regarding the violation of immigration
19 laws of the United States. In 2009, I graduated from the United States Border Patrol
20 Academy at the FLETC in Artesia, New Mexico. My education includes a Bachelor of Arts
21 degree in Political Science and a Bachelor of Arts degree in Criminology from the
22 University of Florida.

23 2. I am assigned to HSI's National Security and Public Safety group in Blaine,
24 WA (hereinafter "HSI Blaine"), which focuses on the enforcement of immigration laws
25 (Title 8, United States Code), including human trafficking and human smuggling, as well
26 as the investigation of transnational gangs. I am authorized to investigate and enforce
27 violations of federal criminal statutes, including those in Titles 8, 18, and 21 of the United
28 States Code.

3. The facts set forth in this Affidavit are based on my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; interviews of cooperating witnesses; review of documents and records related to this investigation; communications with others who have personal knowledge of the events and circumstances described herein; and information gained through my training and experience.

4. Because this Complaint is submitted for the limited purpose of establishing probable cause, it does not set forth each and every fact that I or others have learned during the course of this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Jaspal GILL has committed the offense of Conspiracy to Transport and Harbor Illegal Aliens¹ for Profit, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (ii), and (iii), and 1324(a)(1)(B)(i).

LAW AND BACKGROUND RELATING TO NON-CITIZEN SMUGGLING

ORGANIZATIONS

5. I know from training and experience that under 8 U.S.C. § 1324(a)(1)(A)(ii) it is illegal to knowingly or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, to transport, or attempt to transport, such alien in order to help the alien remain in the United States illegally.

6. In addition, I know that under 8 U.S.C. § 1324(a)(1)(A)(iii) it is illegal to knowingly or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, to harbor, or attempt to harbor, such alien, with the intent to violate the law.

7. I further know that under 8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (II) it is unlawful to conspire to commit, or aid or abet the commission of the crimes listed in 8 U.S.C. §§

¹ The word “alien” is used in Title 8 of the United States Code. Throughout this affidavit, and consistent with Executive Branch policy, when referencing offenses as defined in Title 8 of the United States Code, the author uses the term “alien,” when not referring specifically to Title 8 of the United States Code, the term “noncitizen” is used in lieu of the term “alien.”

1 1324(a)(1)(A)(i)-(iii).

2 8. From my training and experience as an HSI Special Agent, I know that
 3 undocumented noncitizens who cannot secure non-immigrant or immigrant visas to
 4 lawfully enter the United States generally choose instead to enter the United States illegally
 5 between the ports of entry on the southern and northern borders.

6 9. Because of their general unfamiliarity with the terrain and border
 7 environment or with the methods and routes used to successfully cross the border without
 8 detection by government officials, undocumented noncitizens seeking to enter the United
 9 States without inspection frequently hire individuals, known as smugglers, who have
 10 experience bringing individuals into the United States without detection.

11 10. Several undocumented noncitizen smuggling organizations operate in the
 12 lower mainland of British Columbia, Canada. These organizations typically charge
 13 undocumented noncitizens between \$2,000 and \$5,000 (USD) to be illegally brought
 14 across the U.S. border. Fees charged by these organizations vary on different factors. This
 15 can include if an undocumented noncitizen is housed by the organization during their
 16 illegal border crossing, or if the organization transports the undocumented noncitizen a
 17 significant distance during the illegal entry. The relative risk of the route used to enter the
 18 U.S. is also a factor that can affect the fee.

19 11. Undocumented noncitizen smuggling organizations operating in the lower
 20 mainland of British Columbia typically have U.S. associates who pick up the
 21 undocumented noncitizens once they cross the border illegally. These U.S. associates
 22 typically transport the undocumented noncitizens to the Seattle area, where associates may
 23 then assist the undocumented noncitizens with travel arrangements to other U.S. locations.
 24 These undocumented noncitizen smuggling organizations may assist in facilitating a driver
 25 to transport undocumented noncitizens to other states, as many illegal entrants lack the
 26 identification required to travel by air or other mass transportation.

27 12. Many of these undocumented noncitizen smuggling organizations work with
 28 individuals known as “brokers,” who arrange travel for the undocumented noncitizens from

1 their home countries through various transit nations into the U.S. for fees ranging from
 2 \$30,000 to \$70,000 (USD). These brokers will often also arrange for fraudulent travel and
 3 identification documents to facilitate the undocumented noncitizen's travel.

4 **PROBABLE CAUSE**

5 **A. Use of Uber Drivers to Transport Non-Citizens Smuggled by GILL**

6 13. In 2018, Homeland Security Investigations (HSI) Blaine began investigating
 7 a non-citizen smuggling organization that was suspected of smuggling non-citizens into
 8 the United States through the U.S. – Canada border in Whatcom County, Washington.
 9 Through the course of this investigation, investigators have determined that beginning no
 10 later than summer 2018, the smuggling organization has used, and continues to use, Uber
 11 drivers to transport undocumented noncitizens from the U.S. – Canada border to various
 12 locations in the greater Seattle area.

13 14. Based upon records provided by Uber, investigators observed a pattern
 14 associated with the Uber trips involving the transportation of non-citizens that were being
 15 smuggled by the organization. Specifically, investigators noted that the Uber trips would
 16 consist of two legs. The first leg of the trip would originate from near the U.S. – Canada
 17 border and would terminate at an intermediate location—most often the Seattle-Tacoma
 18 International Airport (hereinafter “Sea-Tac Airport”). The second leg would then
 19 commence from the vicinity of the prior drop-off location and would terminate near a
 20 suspected stash house located at 11221 SE 240th Place, Kent, WA (hereinafter “the Kent
 21 Residence”), near another suspected stash house located at 2743 Fiddleback St. NE, Lacey,
 22 WA (hereinafter “the Lacey Residence”),² or at motels in the greater Seattle-area.

23 15. Though investigators have identified seventeen Uber accounts that are
 24 believed to have been used by the organization since the inception of the investigation in
 25
 26
 27

28 ² According to Thurston County records, Daljit KAUR—GILL’s spouse—purchased 2743
 Fiddleback St. NE, Lacey, WA, in February 2019.

1 2018, many of these accounts are no longer in use by the organization.³ However, at least
 2 four of these Uber accounts—each created in March 2019 or prior—remained active
 3 through at least April 2022. These four accounts are:

Uber Account Name	Phone Number Associated with Account
Uber Account 1	XXX-XXX-2319
Uber Account 2	XXX-XXX-0806
Uber Account 3	XXX-XXX-3602
Uber Account 5	XXX-XXX-5202

9 **Uber Account 1**

10 16. Uber Account 1 was created on February 4, 2018. As detailed below, a
 11 review of Uber Account 1 suggests that Uber Account 1 has been used in conjunction with
 12 other Uber Accounts to move suspected undocumented noncitizens from near the U.S. –
 13 Canada border to Sea-Tac Airport, and then to the Kent Residence, the Lacey Residence,
 14 and other areas known and unknown.

15 17. While Uber Account 1 has never been used to order an Uber trip originating
 16 near the U.S. – Canada border, it has been used repeatedly as a second leg of an Uber trip
 17 that originated near the U.S. – Canada border. Specifically, from September 16, 2018, to
 18 May 29, 2021, at least ninety of the 140 Uber trips ordered by Uber Account 1 originated
 19 at, or near, Sea-Tac Airport, and were ordered within thirty minutes of the termination of
 20 another Uber Trip—ordered by a different Uber account—that ended at, or near, Sea-Tac
 21 Airport. As noted, each of these apparent first legs of a split-trip originated near the U.S. –
 22 Canada border.

23 18. The below chart showing trip-splitting⁴ at Sea-Tac Airport—with Uber
 24 Account 1 always being the second leg—is representative of these ninety trips involving

26 ³ The total value of the Uber fares identified in furtherance of the charged conspiracy, and
 27 occurring from July 2018 through April 2022, exceeds \$75,000.

28 ⁴ Based on records provided by Uber, law enforcement’s knowledge of this investigation, and the
 patterns identified herein, investigators believe that members of the organization are splitting trips

1 the two separate Uber accounts with trip-splitting at Sea-Tac Airport. Moreover, from
 2 January 27, 2020, through April 22, 2022, when Uber Account 1 has been used in
 3 conjunction with another Uber account to split a trip at or near Sea-Tac Airport, the first
 4 leg of the trip was always ordered by either Uber Account 2 or Uber Account 3.

	Date	Departure	Origin	Arrival	Destination	Uber Account
Leg 1	9/16/2018	4:36 a.m.	Lynden, WA	6:36 a.m.	Sea-Tac Airport	N.B.
Leg 2	9/16/2018	6:57 a.m.	Radisson Hotel Sea- Tac ⁵	7:15 a.m.	9620 S. 242nd Ct., Kent, WA ⁶	Uber Account 1
Leg 1	1/31/2019	4:32 a.m.	Nooksack, WA	6:34 a.m.	Sea-Tac Airport	D.S.
Leg 2	1/31/2019	6:50 a.m.	Radisson Hotel Sea- Tac	7:14 a.m.	11222 SE 240th Pl., Kent, WA ⁷	Uber Account 1
Leg 1	4/11/2019	5:28 a.m.	Lynden, WA	7:50 a.m.	Sea-Tac Airport	Uber Account 5
Leg 2	4/11/2019	8:05 a.m.	Radisson Hotel Sea- Tac	8:27 a.m.	10715 SE 240th St., Kent WA ⁸	Uber Account 1
Leg 1	1/6/2020	2:19 a.m.	Custer, WA	4:09 a.m.	Sea-Tac Airport	Uber Account 2
Leg 2	1/6/2020	4:28 a.m.	Radisson Hotel Sea- Tac	4:46 a.m.	11211 SE 240th Pl., Kent WA ⁹	Uber Account 1
Leg 1	1/19/2021	5:27 a.m.	Ferndale, WA	8:04 a.m.	Radisson Sea-Tac	Uber Account 2

21
 22
 23 to obscure the origin of the trip, *i.e.*, the international border, and to provide a potential lack of
 24 knowledge defense relating to the immigration status and/or manner of entry of the noncitizens
 25 that the organization is smuggling.

26 ⁵ The Radisson Hotel Seattle Airport (“Radisson Hotel Sea-Tac”) is located at 18118 International
 Blvd., Seattle, WA 98188.

27 ⁶ This address is located approximately 1.2 miles from the Kent Residence.

28 ⁷ This address is located two houses away from the Kent Residence.

⁸ This address is located approximately .4 miles from the Kent Residence.

⁹ This address is located across the street from the Kent Residence.

1	Leg 2	1/19/2021	8:09 a.m.	Radisson Hotel Sea-Tac	9:11 a.m.	Starbucks Lacey, WA ¹⁰	Uber Account 1
2	Leg 1	5/29/2021	3:38 a.m.	Ferndale, WA	5:31 a.m.	Radisson Sea-Tac	Uber Account 3
3	Leg 2	5/29/2021	5:39 a.m.	Radisson Hotel Sea-Tac	6:25 a.m.	2719 Fiddelback St, NE, Lacey, WA ¹¹	Uber Account 1

7 19. Records provided by Verizon on January 27, 2022, show that the phone
 8 number associated to Uber Account 1 is a prepaid account with a subscriber listed as “Info
 9 Update” and an address of 295 Parkshore Drive, Folsom, CA. These records also show that
 10 the phone number associated to Uber Account 1—XXX-XXX-2319¹²—has been active
 11 with the same subscriber information associated to it since January 28, 2018.

12 **Uber Account 2**

13 20. Uber Account 2 was created on September 27, 2018. According to Uber
 14 records obtained in February 2022, Uber Account 2 ordered approximately ninety-three
 15 Uber trips from January 3, 2019, through February 13, 2022. Beginning in May 2019, and
 16 continuing until October 18, 2021, Uber Account 2 was used to order thirty-six fares that
 17 originated near the U.S. – Canada border and terminated at the Sea-Tac Airport, the
 18 Radisson Sea-Tac, or other locations adjacent to Sea-Tac Airport.

19 21. Moreover, on January 26, 2022, Uber Account 2 and Uber Account 3 were
 20 involved in an apparent split-trip that originated near the U.S. – Canada border and
 21 terminated at a hotel in Kent, WA. Specifically, Uber Account 3 ordered a trip that
 22 originated near Badger Road in Lynden, WA, at approximately 4:55 a.m. That trip
 23 terminated at the Mariner Park and Ride in Everett, WA (hereinafter “Mariner Park and

25 ¹⁰ The drop-off location for this trip is located approximately 2.1 miles from the Lacey Residence.

26 ¹¹ This address is located 180 feet from the Lacey Residence.

27 ¹² During this investigation, law enforcement has obtained cell site location information and GPS
 28 ping warrants for this phone. Based upon this information, as well as other information I have
 learned in this investigation, I believe that this phone is GILL’s daily use phone, that he has used
 this phone since account activation, and continues to use this phone.

1 Ride"), at approximately 6:19 a.m. At approximately 6:28 a.m., a trip ordered by Uber
 2 Account 2, originated at a Starbuck's in Everett, WA—that is 500 feet from the Mariner
 3 Park and Ride. This second leg, ordered by Uber Account 2, terminated at the Century
 4 Motel in Kent, WA (hereinafter "Century Motel"), at 7:09 a.m.

5 22. Additionally, beginning on February 9, 2021, and as recently as January 11,
 6 2022, Uber Account 2 ordered sixteen trips that originated at the Radisson Sea-Tac. Each
 7 of these sixteen trips terminated at one of three locations: a parking lot in Lacey, WA
 8 (twelve trips), the Century Motel (two trips), or a Park and Ride in Kent, WA, that is located
 9 approximately .2 miles from the Century Motel (two trips).

10 23. Two of these sixteen trips, which occurred on August 30, 2021, and October
 11 1, 2021, appear to be split trips from the area near the U.S. – Canada border, with both legs
 12 of each trip being ordered by Uber Account 2. Moreover, even though investigators have
 13 not yet located the first leg—from the border to Sea-Tac airport—for the other fourteen of
 14 these sixteen trips, each of these fourteen trips originated at the Radisson Sea-Tac between
 15 4:56 a.m. and 7:43 a.m., which is consistent with a first leg that originated near the U.S. –
 16 Canada border in the early morning hours.

17 24. According to records provided by Verizon on January 27, 2022, the phone
 18 number associated with Uber Account 2 is a prepaid account with a subscriber listed as
 19 "PHONEINTHEBOX OAS" and an address of 295 Parkshore Drive in Folsom, CA.
 20 According to Verizon records, the phone number associated to Uber Account 2—XXX-
 21 XXX-0806¹³—has had the same subscriber since September 26, 2018.

22 **Uber Account 3**

23 25. Uber Account 3 was created on March 21, 2018. Uber records obtained in
 24 February 2022 show that from May 29, 2021, through February 12, 2022, Uber Account 3

25
 26 ¹³ During this investigation, law enforcement has obtained cell site location information and GPS
 27 ping warrants for this phone. Based upon this information, as well as other information I have
 28 learned in this investigation, I believe that GILL has used this phone since account activation. I
 believe that GILL was using this phone as recently as May 11, 2022, which is the last time that
 law enforcement received a GPS ping for this device.

1 ordered a total of fifty trips. Of these fifty total Uber fares, twenty-four involved trips that
 2 originated near the U.S. – Canada border and terminated at the Sea-Tac Airport, the
 3 Radisson Sea-Tac, or at a gas station located next to Sea-Tac Airport.

4 26. One of the twenty-four border trips, which occurred on September 15, 2021,
 5 appears to have been in tandem with Uber Account 2. Specifically, the Uber Account 3
 6 border trip terminated at Sea-Tac at 6:34 a.m., with Uber Account 2 ordering a trip that
 7 originated at the Radisson Sea-Tac at 6:53 a.m. The second leg of the trip, ordered by Uber
 8 Account 2, terminated at the Century Motel at 7:04 a.m.

9 27. Another one of the twenty-four border trips, which occurred on September
 10 7, 2021, involved trip-splitting with both legs of the trip being ordered by Uber Account 3.
 11 Specifically, the first leg of the trip began near the U.S. – Canada border at 5:01 a.m., and
 12 ended at 7:24 a.m. at Sea-Tac Airport. The second leg of the trip originated at the Radisson
 13 Sea-Tac at 7:44 a.m., and terminated at 8:29 a.m. at a Lacey, WA, parking lot that is
 14 approximately 2.1 miles from the Lacey Residence.

15 28. In addition to the September 7, 2021, trip noted above, Uber Account 3
 16 ordered another ten trips that originated at the Radisson Sea-Tac. The first of these ten trips
 17 occurred on July 15, 2021, and the last was on February 9, 2022. Each of these ten trips
 18 terminated at either the Lacey, WA parking lot (five trips) or the Century Motel (five trips).

19 29. Finally, Uber records show that from October 13, 2021, through January 26,
 20 2022, Uber Account 3 was used to order nine Uber trips that originated near the U.S. –
 21 Canada border and terminated at the Mariner Park and Ride. Investigators have only been
 22 able to identify the second leg of five of these trips, including one involving Uber Account
 23 2 on January 26, 2022, as discussed above.

24 30. AT&T Wireless records show that the phone number associated to Uber
 25 Account 3 is connected to a prepaid account with the subscriber information labeled as
 26 “PREPAID CUSTOMER” with an address of 17330 Preston Road in Dallas, TX. Based
 27 on information provided by AT&T, the phone number associated to Uber Account 3—
 28

1 XXX-XXX-3602¹⁴—has been assigned to the same prepaid customer since January 22,
 2 2019.

3 **Uber Account 5**

4 31. Uber Account 5 was created on March 17, 2019. Uber records obtained in
 5 February 2022 show that from March 18, 2019, through February 9, 2022, Uber Account
 6 ordered a total of seventeen trips. Of these seventeen total Uber fares, eight have involved
 7 trips that originated near the U.S. – Canada border and five of those terminated at the Sea-
 8 Tac Airport.

9 32. One of the eight border trips, which occurred on February 2, 2022, appears
 10 to have been in tandem with Uber Account 3. Specifically, the Uber Account 5 border trip
 11 terminated at Sea-Tac at 3:21 a.m., with Uber Account 3 ordering a trip that originated at
 12 the Radisson Sea-Tac at 3:43 a.m. The second leg of the trip, ordered by Uber Account 3,
 13 terminated at the Century Motel at 3:52 a.m.

14 33. Another one of the eight border trips, which occurred on January 25, 2022,
 15 involved trip-splitting with both legs of the trip being ordered by Uber Account 5.
 16 Specifically, the first leg of the trip began near the U.S. – Canada border at 3:18 a.m. and
 17 ended at 5:05 a.m. at Sea-Tac Airport. The second leg of the trip originated at the Radisson
 18 Sea-Tac at 5:24 a.m. and terminated at 5:35 a.m. at the Century Motel.

19 34. AT&T Wireless records show that the phone number associated to Uber
 20 Account 5 is connected to a prepaid account with the subscriber information labeled as
 21 “PREPAID CUSTOMER” with an address of 123 Your Street, Your Town, GA. Based on
 22 information provided by AT&T, the phone number associated to Uber Account 5—XXX-

23
 24
 25
 26 ¹⁴ During this investigation, law enforcement has obtained cell site location information and GPS
 27 ping warrants for this phone. Based upon this information, as well as other information I have
 28 learned in this investigation, I believe that GILL has used this phone since account activation. I
 believe that GILL was using this phone as recently as May 8, 2022, which is the last time that law
 enforcement received a GPS ping for this device.

1 XXX-5202¹⁵—has been assigned to the same prepaid customer since October 20, 2021.

2 **B. Identification of the Kent Residence in December 2018**

3 35. On December 3, 2018, at 2:05 a.m., HSI Blaine conducted electronic
 4 surveillance of a Camry with Washington license plate XXX5468, as it left 1861 Emerald
 5 Lane, Lynden, WA. According to a court-authorized GPS tracker, at 2:10 a.m., the Camry
 6 stopped briefly on Berthusen Road in Lynden, WA, approximately four miles south of the
 7 U.S. – Canada border. HSI Blaine continued electronic surveillance of the Camry as it
 8 traveled directly to Sea-Tac Airport, roughly 115 miles from Lynden.

9 36. Once the Camry arrived at the airport, Supervisory Special Agent (SSA) Loic
 10 Gunn observed four occupants—two men of apparent Indian descent, one woman of
 11 apparent Indian descent, and a young child—get out of the vehicle near the American
 12 Airlines departure drop-off area. Investigators maintained surveillance on foot as these four
 13 individuals left the drop-off area and walked downstairs to the arrival’s concourse.

14 37. SA Brian Faria then observed these four individuals cross Pacific Highway
 15 South to the parking lot of the Radisson Sea-Tac, where they were picked up by a silver
 16 2017 Toyota Prius bearing Washington license plates (hereinafter “the Prius”), registered
 17 to an individual known to law enforcement (hereinafter “Co-conspirator 1”) at the Kent
 18 Residence.

19 38. HSI Blaine and Seattle agents continued surveillance of the Prius as it drove
 20 to the Econo Lodge hotel at 1233 Central Ave., Kent, WA, arriving at 4:36 a.m. Once at
 21 the Econo Lodge, the occupants of the Prius, including Co-conspirator 1, entered Room
 22 108. Five minutes later, Co-conspirator 1 left Room 108 by himself and departed the hotel
 23 in the Prius.

24
 25
 26 ¹⁵ During this investigation, law enforcement has obtained cell site location information and GPS
 27 ping warrants for this phone. Based upon this information, as well as other information I have
 28 learned in this investigation, I believe that GILL has used this phone since account activation. I
 believe that GILL was using this phone as recently as May 3, 2022, which is the last time that law
 enforcement received a GPS ping for this device.

1 39. Co-conspirator 1 returned to the hotel in the Prius around noon. Agents
 2 watched him enter Room 108 with a small plastic grocery bag. Five minutes later, Co-
 3 conspirator 1 left the room and entered the hotel lobby. Co-conspirator 1 returned to Room
 4 108 before departing in the Prius at 12:15 p.m.

5 40. At 10:18 p.m., agents observed Co-conspirator 1 return to the hotel in the
 6 Prius. A few minutes later, the four occupants—two men, a woman, and a child—left the
 7 room and got into the Prius. Co-conspirator 1 parked near the lobby and went inside for
 8 several minutes before exiting the lobby with papers in his hand. Co-conspirator 1
 9 reentered the Prius and drove the passengers to the Kent Residence without stopping.

10 **C. Identification of Avis Budget One-Way Rentals from Washington to
 11 Illinois in March 2019**

12 41. On March 11, 2019, HSI Seattle Agents established surveillance on the Kent
 13 Residence. At approximately 9:30 a.m., SA McGeachy observed a white 2018 Nissan
 14 Armada, bearing California Plate XXXK450 arrive at the residence (hereinafter “the 2018
 15 Armada”). At approximately 9:48 a.m., SA McGeachy observed the Prius depart the
 16 residence and minutes later arrive at a McDonalds parking lot located at 10715 SE 240th
 17 St. Kent, WA.

18 42. Upon arrival at the McDonalds, SA Yilin Wu observed the male driver of the
 19 Prius exit the vehicle and wave at three females and one male. All four individuals walked
 20 to the Prius and entered the vehicle. The Prius then returned to the Kent Residence, arriving
 21 at approximately 9:52 a.m.

22 43. At approximately 10:10 a.m., SA McGeachy observed the 2018 Armada
 23 return to the residence. SA McGeachy then observed as the driver of the 2018 Armada
 24 unloaded what appeared to be groceries from the back of the vehicle. At approximately
 25 10:17 a.m., SA McGeachy observed the 2018 Armada depart the area of the residence with
 26 at least four individuals inside the vehicle.

27 44. A registration check of the 2018 Armada showed that the owner of the
 28 vehicle was PV Holdings, the parent company of Avis Budget Group car rental. According

1 to information provided by Avis, at approximately 7:45 a.m., on March 11, 2019, a person
 2 known to law enforcement (hereinafter “Co-conspirator 2”) rented the 2018 Armada from
 3 an Avis located at Sea-Tac Airport. Avis personnel indicated that the vehicle was a one-
 4 way rental with a scheduled drop-off date of March 13, 2019, at Chicago O’Hare
 5 International Airport (hereinafter “Chicago O’Hare Airport”). According to information
 6 provided by Avis personnel on March 14, 2019, the vehicle was returned on March 12,
 7 2019, at 8:18 p.m. at Chicago O’Hare Airport.

8 45. Avis personnel indicated that Co-conspirator 2 made a similar one-way rental
 9 from Sea-Tac Airport on March 6, 2019, with a drop-off at Chicago O’Hare Airport on
 10 March 8, 2019. A review of Uber records indicates that an Uber account with username
 11 “D.S.” ordered a split border trip on March 5, 2019. The first leg of this trip originated at
 12 5:15 a.m., near the U.S. – Canada border, and terminated at 6:45 a.m., near the Mariner
 13 Park and Ride in Everett, WA. The second leg of the trip originated at 7:02 a.m., near the
 14 Mariner Park and Ride, and terminated at 10204 SE 240th St. Kent, WA, at 8:00 a.m. The
 15 drop-off location for this split border trip is approximately .8 miles from the Kent
 16 Residence.

17 46. On March 13, 2019, HSI Blaine investigators received information from
 18 Avis regarding another one-way rental from Sea-Tac Airport to Chicago O’Hare Airport.
 19 Specifically, Avis personnel indicated that an individual known to law enforcement
 20 (hereinafter “Co-conspirator 3”) was scheduled to pick-up a vehicle from Avis Sea-Tac
 21 Airport at 11:00 p.m., on March 14, 2019. The vehicle was scheduled to be returned at
 22 Chicago O’Hare Airport on March 18, 2019. This reservation went unfulfilled.¹⁶

23 47. On March 18, 2019, HSI Blaine investigators received information from
 24 Budget personnel that another Sea-Tac Airport to Chicago O’Hare Airport one-way rental
 25 had been made in the name of Co-conspirator 3. Specifically, Budget personnel indicated
 26

27 ¹⁶ Of note, On March 12, 2019, and March 13, 2019, United States Border Patrol Agents
 28 apprehended a group of four undocumented noncitizens and a group of three undocumented
 noncitizens, respectively, near the U.S. – Canada border.

1 | that Co-conspirator 3 was scheduled to pick-up a vehicle from Budget Sea-Tac Airport at
 2 | 9:15 p.m., on March 18, 2019, with a scheduled return of the vehicle at Chicago O'Hare
 3 | Airport on March 22, 2019.

4 | 48. On March 18, 2019, at approximately 8:30 p.m., HSI Agents installed a
 5 | court-authorized GPS tracking device on a silver GMC Yukon bearing Washington license
 6 | plate XXX3360 (hereinafter referred to as the "Yukon"), the vehicle identified by Budget
 7 | personnel as the vehicle that would be used to fulfill the reservation.

8 | 49. On March 19, 2019, at approximately 5:45 a.m., GPS tracking data placed
 9 | the Yukon at the Kent Residence. After stopping at the Kent Residence for approximately
 10 | ten minutes, the GPS tracking device showed that the Yukon proceeded directly to I-90
 11 | eastbound. Over the next day, HSI agents tracked the vehicle using the GPS tracking
 12 | device, as the Yukon headed eastbound on I-90 towards Chicago.

13 | 50. On March 20, 2019, Detectives from the Winnebago County Sheriff's office
 14 | conducted a traffic stop of the Yukon on eastbound I-90 in Roscoe, Illinois. The driver of
 15 | the vehicle, Co-conspirator 3, was positively identified by his Washington State driver's
 16 | license. The other seven passengers in the vehicle, did not have any identification
 17 | documents on their person.

18 | 51. Records obtained from Uber show three separate split border trips in the
 19 | preceding days.

20 | 52. The first trip originated on March 14, 2019, at 4:55 a.m., near the U.S. –
 21 | Canada Border in Lynden, WA, and ended near the Mariner Park and Ride in Everett, WA,
 22 | at 6:25 a.m. At 6:37 a.m., a trip ordered by Uber Account 1 originated near the Mariner
 23 | Park and Ride, and ended at 7:34 a.m., two houses away from the Kent Residence.

24 | 53. The second split border trip originated on March 18, 2019, at 3:10 a.m., near
 25 | the U.S. – Canada Border in Lynden, WA, and terminated at the Mariner Park and Ride at
 26 | 4:38 a.m. This first leg was ordered by Uber Account 5. The second leg of the trip
 27 | originated near the Mariner Park and Ride at 4:53 a.m., and ended at 5:36 a.m., .3 miles
 28 | from the Kent Residence.

1 54. The third trip—ordered by Uber Account 2—began at 4:01 a.m. on March
 2 18, 2019, near the U.S. – Canada Border, and ended at the Mariner Park and Ride at 5:22
 3 a.m. The second leg of the trip—ordered by Uber Account 1—began at 5:32 a.m., and
 4 ended at 6:20 a.m., one house away from the Kent Residence.

5 55. On March 29, 2019, HSI Blaine investigators received information from
 6 Avis Budget personnel regarding two new reservations for one-way rentals from Sea-Tac
 7 Airport to Chicago—both scheduled to be returned at Chicago O’Hare Airport.

8 56. The first rental was for Co-conspirator 2 with a scheduled pick up from Sea-
 9 Tac airport on March 29, 2019. The vehicle was scheduled to be returned at Chicago
 10 O’Hare Airport on April 1, 2019. The individual making the reservation requested a large
 11 SUV.

12 57. The second rental reservation was in the name of an individual known to law
 13 enforcement (hereinafter “Co-conspirator 4”). Avis Budget personnel indicated that Co-
 14 Conspirator 4 was also scheduled to pick up a Chevrolet Tahoe from Budget Sea-Tac
 15 Airport on March 29, 2019, and return it to the Chicago O’Hare Airport on April 1, 2019.

16 58. On March 29, 2019, at approximately 7:40 p.m., Avis Budget personnel
 17 informed HSI SA Montgomery that Co-conspirator 4 had requested a larger vehicle, and
 18 ultimately, a Ford Expedition was used to fill Co-conspirator 4’s reservation.

19 59. On March 30, 2019, between approximately 5:23 a.m. and 5:29 a.m., court-
 20 authorized GPS tracking data placed the Expedition in the cul-de-sac of the Kent
 21 Residence. According to the tracker data, the Expedition then departed Kent, WA, and
 22 eventually traveled eastbound on I-90. Over the next day, HSI agents tracked the vehicle
 23 using the GPS tracking device, as the Expedition headed eastbound on I-90 towards
 24 Chicago.

25 60. On March 31, 2019, at approximately 1:30 p.m., after the Expedition crossed
 26 into Illinois, HSI Chicago agents began physical surveillance of the Expedition. The
 27 Expedition appeared to be occupied by at least six individuals.
 28

1 61. At approximately 2:42 p.m., the Expedition arrived at the Patel Bros. Grocery
 2 Store in Schaumburg, IL. At least two of the individuals exited the Expedition and entered
 3 a Honda Pilot. Investigators followed the Pilot to an address in Munster, Indiana, where
 4 the occupants of the vehicle entered an unknown building located at 10434 White Oak
 5 Lane in Munster, Indiana.

6 62. Records obtained from Uber show five separate Uber split border trips in the
 7 preceding days, with each trip ending at or near the Kent Residence. Investigators noted
 8 two split trips on March 26, 2019 (with two of the four legs being ordered by Uber Account
 9 1 or 5), two split trips on March 28, 2019 (with two of the four legs being ordered by Uber
 10 Account 1 or 2), and one split trip on March 29, 2019 (with the second leg of the trip being
 11 ordered by Uber Account 1).

12 **D. July 24, 2021, Smuggling Event Involving GILL, Co-conspirator 2, and**
 13 **Co-conspirator 3**

14 63. In August 2021, investigators reviewed surveillance video of a smuggling
 15 event that occurred on July 24, 2021, at Shell gas station, located at 4542 Martin Way E.,
 16 Olympia, WA.

17 64. During their review of the surveillance video, investigators noted that at
 18 12:14 a.m., on July 24, 2021, a red sports utility vehicle (SUV), driven by Co-conspirator
 19 2, arrived at the gas station and parked at one of its gas pumps. Approximately three
 20 minutes later, a white 2010 Nissan Armada, registered to Daljit KAUR at an Elk Grove,
 21 CA, residence (hereinafter “the 2010 Armada”) arrived on the opposite side of the gas
 22 pump. Investigators then observed six suspected undocumented noncitizens exit the 2010
 23 Armada and enter the red SUV. These individuals were traveling with either no personal
 24 belongings or, at most, a backpack.

25 65. At approximately 12:36 a.m., investigators observed the 2010 Armada return
 26 to the gas station and park at another gas pump. Within seconds, a grey Chrysler Pacifica
 27 minivan, bearing Washington license plate BWS4749, approached the opposite side of the
 28 gas pump. A male subject with a long grey beard, with a blue zip-up sweatshirt and grey

1 sweatpants, can be seen exiting the driver's seat of the 2010 Armada. Based upon my
 2 review of the surveillance video, and my review of multiple photographs of GILL, I believe
 3 that the driver of the 2010 Armada is GILL. GILL can then be seen speaking with the driver
 4 of the minivan ("Co-conspirator 3), and then appears to direct individuals to exit the 2010
 5 Armada and enter the grey minivan. Once again, each of the six individuals is observed to
 6 have very little personal belongings. After a few minutes, both vehicles depart the area.

7 66. Based upon registration checks, it was determined that the registered owner
 8 of the grey minivan was EAN Holdings, which among other companies, is the parent
 9 company of Enterprise Car Rental.

10 67. According to records provided by Enterprise, the renter of the grey minivan,
 11 a 2020 Chrysler Pacifica, bearing Washington license plate BWS4749, was "Co-
 12 conspirator 3." This vehicle was rented on July 23, 2021, in Puyallup, WA, and returned
 13 on July 25, 2021, at Chicago O'Hare International Airport.

14 68. According to an open-source search in Google Maps, the Lacey Residence is
 15 approximately a seven-minute drive from the Shell gas station in Olympia, WA. Based on
 16 the timeframe observed in the surveillance footage, I believe that after GILL dropped off
 17 the first set of six individuals who left the area in a red SUV being driven by Co-conspirator
 18 2, GILL returned to the Lacey Residence, where additional undocumented noncitizens
 19 were being staged. I believe that GILL then returned to the same gas station with a second
 20 set of noncitizens being smuggled, and these individuals were then further transported in
 21 the grey Chrysler minivan driven by Co-conspirator 3 that Co-conspirator 3 had rented on
 22 July 23, 2021.

23 69. Based upon a review of records provided by Uber, investigators know that
 24 there were six split border trips involving Uber Accounts 2 and 3 between July 15, 2021,
 25 and July 23, 2021. Each of these trips originated near the U.S. – Canada border in the early
 26 morning hours, was split at the Radisson Sea-Tac, and then terminated at the same Lacey,
 27 WA, parking lot—that is approximately 2.1 miles from the Lacey Residence. Investigators
 28 believe that some, or all, of these six Uber trips involved the initial transport and staging

1 of undocumented noncitizens at the Lacey Residence, before further transport by the
 2 smuggling organization on July 24, 2021, as detailed above.

3 **E. GILL's Use of Capital One Credit Card to Purchase Airfare for**
 4 **Noncitizens Smuggled by the Organization in late 2021 and early 2022**

5 70. On March 23, 2022, Capital One Bank (USA), N.A., provided records for a
 6 Capital One credit card (hereinafter “the Capital One credit card”) in the name of “Jaipaul
 7 Singh.”¹⁷ The address of record for this account was listed as 10074 Dona Neely Way, Elk
 8 Grove, CA, *i.e.*, the Elk Grove Residence, where GILL is suspected to reside.

9 71. On December 23, 2021, at approximately 3:16 a.m., Uber Account 3 ordered
 10 a ride from near the U.S. – Canada border to the Sea-Tac Airport. A subsequent trip-
 11 splitting ride, also ordered by Uber Account 3, departed at 5:25 a.m. from the Radisson
 12 Sea-Tac, and arrived at the Century Motel at 5:36 a.m. Later that evening, at approximately
 13 9:26 p.m., Uber Account 5 was used to order a ride from the Century Motel to the Sea-Tac
 14 Airport.

15 72. On December 23, 2021, a United Airlines flight from Seattle, WA, to
 16 Newark, NJ, was booked using the Capital One credit card account for two passengers. The
 17 credit card statement listed the United Airlines ticket number and the passenger names
 18 “PXXXX/NXXXX B.” and “PXXXX/TXXXXX B.”

19 73. A review of the United Airlines passenger manifest for Flight 2345 with
 20 service from Seattle, WA to Newark, NJ, showed two passengers listed as
 21 “PXXXX/NXXXX B.” and “PXXXX/TXXXXX B.” The manifest also revealed that the
 22 two passengers did not have any checked bags. In my experience, and based upon the
 23 investigation to date, individuals that are smuggled unlawfully into the United States do
 24 not possess more than a small bag of personal belongings.

25
 26 ¹⁷ Investigators believe this name to be an alias of GILL. A Bank of America (BoA) account
 27 previously identified during this investigation also used the name of Jaipaul Singh. Moreover, this
 28 BoA account was used to pay 10 of the 114 payments during the requested time period on the
 Capital One credit card. This bank account, which was closed in October 2021, had an associated
 phone number of XXX-XXX-2319, *i.e.*, the telephone number on record with Uber Account 1.

1 74. On December 24, 2021, at approximately 2:53 a.m., Uber Account 5 ordered
 2 a ride from near the U.S. – Canada border to the Sea-Tac Airport. A subsequent trip-
 3 splitting ride, ordered by Uber Account 2, departed from the Radisson Sea-Tac at 5:01
 4 a.m., and arrived at the Kent-Des Moines Park & Ride—which is located approximately
 5 0.2 miles from the Century Motel—at 5:11 a.m. Later that afternoon, at approximately 3:02
 6 p.m., Uber Account 2 ordered a ride from the Century Motel to the Sea-Tac Airport.

7 75. On December 24, 2021, an Alaska Airlines flight from Seattle, WA, to
 8 Chicago-O’Hare International Airport, was booked using the Capital One credit card
 9 account for two passengers. The credit card statement listed the Alaska Airlines ticket
 10 number and passenger names “PXXXX/PXXXX B.” and “PXXXX/AXXXXXX J.”

12 76. A review of the Alaska Airlines passenger manifest for Flight 26 with service
 13 from Seattle, WA, to Chicago-O’Hare International Airport showed the passengers listed
 14 as “PXXXX/PXXXX B.” and “PXXXX/AXXXXXX J.”

15 77. On February 2, 2022, at approximately 2:53 a.m., Uber Account 5 ordered a
 16 ride from near the U.S. – Canada border to the Sea-Tac Airport. A subsequent trip-splitting
 17 ride, ordered by Uber Account 3, departed from the Radisson Sea-Tac at 3:43 a.m., and
 18 arrived at the Century Motel at 3:52 a.m. Later that evening, at approximately 9:07 p.m.,
 19 Uber Account 2 ordered a ride from the Century Motel to the Sea-Tac Airport.

20 78. On February 2, 2022, a United Airlines flight from Seattle, WA to Newark,
 21 NJ was booked using the Capital One credit card account for two passengers. The credit
 22 card statement listed the United Airlines ticket number and passenger names
 23 “DXXXX/KXXXXXX K.” and “DXXXX/KXXXXXX J.”

24 79. A review of the United Airlines passenger manifest for Flight 2680 with
 25 service from Seattle, WA, to Newark, NJ, showed two passengers listed as
 26 “DXXXX/KXXXXXX K.” and “DXXXX/KXXXXXX J.” The manifest also
 27 revealed that the two passengers did not have any checked bags.

1 80. According to CBSA records, KXXXXXXX K. DXXXX and
 2 KXXXXXXXXX J. DXXXX, entered Canada at Pearson International Airport, Toronto,
 3 Canada, on December 24, 2021. A search of U.S. law enforcement databases revealed that
 4 KXXXXXXXXX J. DXXXX was refused a visitor visa to the United States in 2015. There
 5 is no record of any lawful admission into the United States for either individual.

6 81. On February 8, 2022, at approximately 11:51 p.m., Uber Account 5 ordered
 7 a ride from near the U.S. – Canada border to the Sea-Tac Airport. A subsequent trip-
 8 splitting ride, ordered by the Uber Account 3 on February 9, 2022, departed from the
 9 Radisson Sea-Tac at 2:04 a.m., and arrived at the Century Motel at 2:13 a.m. Later that
 10 evening, at approximately 9:28 p.m., Uber Account 2 ordered a ride from the Century
 11 Motel to the Sea-Tac Airport.

12 82. On February 9, 2022, an Alaska Airlines flight from Seattle, WA to Chicago-
 13 O’Hare was booked using the Capital One credit card account for one passenger. The credit
 14 card statement listed the Alaska Airlines ticket number and passenger name
 15 “PXXXX/DXXXXXXXXX B.”

16 83. A review of the Alaska Airlines passenger manifest for Flight 718 with
 17 service from Seattle, WA, to Chicago-O’Hare International Airport, showed one passenger
 18 listed as “PXXXX/DXXXXXXXXX B.”

19 84. CBSA searched their records and found a match to this subject that entered
 20 Canada on a student visa to attend St. Clair College. The subject, DXXXXXXXXX B.
 21 PXXXX, entered Canada through Montréal-Trudeau International Airport on October 29,
 22 2021. CBSA confirmed with the college that the subject never enrolled for classes at this
 23 college. A review of various law enforcement databases indicate that this individual has
 24 never applied for permission to enter, nor been lawfully admitted into, the United States.

25 85. During the period requested for the Capital One credit card records
 26 (December 10, 2020 – February 21, 2022), the account was used to purchase \$12,400.38
 27 in airfare. Significantly, none of the passenger names for any flights listed on the credit
 28 card statements showed the name of the credit card holder.

1 **F. GILL's Purchase of Uber Gift Cards on March 29, 2022, and Use of**
 2 **Uber Gift Cards During Smuggling Events on April 15 and 16, 2022**

3 86. Based on records provided by Uber, at approximately 6:06 p.m., on March
 4 29, 2022, a purchase of two Uber gift cards totaling \$350 was made at a Rite Aid located
 5 at 10570 Twin Cities Road, Galt, CA (hereinafter "the Galt Rite Aid").¹⁸

6 87. The first gift card purchased in Galt, CA, on March 29, 2022, was redeemed
 7 by Uber Account 3 during a suspected smuggling event detailed below.

8 88. On April 15, 2022, at 4:33 p.m., Uber Account 3 requested the first leg of a
 9 split trip ride, both ordered by Uber Account 3. This first leg originated from Cornwall
 10 Avenue in Bellingham, WA, at 4:34 p.m. and ended in Everett, WA, at 6:29 p.m. Based on
 11 location data from Uber, the location of the destination in Everett was a Kentucky Fried
 12 Chicken restaurant. The second leg of the split-trip, also ordered by Uber Account 3,
 13 departed just behind the same restaurant at 6:40 p.m. and arrived at the Century Motel in
 14 Kent, WA, at 7:25 p.m.

15 89. The second gift card that was purchased on March 29, 2022, at the Galt Rite
 16 Aid was redeemed on April 16, 2022, at 1:31 a.m. by the user of Uber Account 3. This gift
 17 card redemption also corresponds to another suspected human smuggling event that
 18 occurred shortly thereafter.

19 90. On April 16, 2022, at approximately 2:48 a.m., Uber Account 3 requested
 20 the first leg of a trip-splitting ride that originated from near the U.S. – Canada border. This
 21 trip originated at 3:16 a.m., near 2855 Whitewood Drive in Custer and arrived at Sea-Tac
 22 Airport at 5:15 a.m. The second leg of the split-trip, ordered by Uber Account 1, departed
 23 the Radisson Sea-Tac at 5:31 a.m., and at 6:21 a.m. arrived at 2727 Fiddleback Street NE,
 24 Lacey, WA. This location is three houses away from the Lacey Residence.

25
 26
 27
 28 ¹⁸ This Rite Aid is located approximately 2.1 miles from a residence owned by Daljit KAUR.
 Investigators observed GILL at this residence on May 10, 2022.

1 91. Based on remote video surveillance at the Lacey Residence, at 6:20 a.m., the
 2 garage to the residence opened without any cars in the area. Less than a minute later, three
 3 individuals, each appearing to be carrying a backpack, walked up to the residence, entered
 4 the garage, and walked into the house. After a short time, the garage then closed behind
 5 them.



13 92. Later that evening, at approximately 8:37 p.m., a ride was ordered by Uber
 14 Account 1 from 2801 Fiddleback St. NE in Lacey, WA, which is directly next door to the
 15 Lacey Residence. This Uber trip arrived at Sea-Tac Airport at 9:25 p.m.

16 93. Based on the remote video surveillance from the Lacey Residence, at 8:37
 17 p.m., what appears to be the same three individuals that arrived earlier in the morning,
 18 emerged from the garage and stood outside until, within thirty seconds, a vehicle pulled up
 19 and the individuals entered the vehicle. Based on the time and vehicle described by Uber,
 20 I believe this to be the same trip, ordered by Uber Account 1, to the Sea-Tac Airport.
 21 Through my investigation, I believe these people to be undocumented noncitizens that
 22 GILL had smuggled into the United State and harbored at the Lacey Residence, before
 23 their additional transportation in furtherance of their unlawful entry into the United States.

24 //

25 //

26 //

27

28



15 **G. GILL's Purchase of Uber Gift Cards on April 21, 2022**

16 94. According to Uber records, on April 21, 2022, at 12:54 a.m., Uber gift cards
 17 in the amount of \$150 and \$200 were purchased at a Walgreens in Elk Grove, CA.
 18 According to these same records, these gift cards were credited to Uber Account 3 at 2:15
 19 a.m. and 2:17 a.m. later that morning. Uber records further confirmed that at 2:59 a.m.,
 20 Uber Account 3 ordered a fare with an origination near where the three noncitizens were
 21 apprehended—with an intended destination of Sea-Tac Airport.

22 95. On May 6, 2022, investigators obtained video surveillance from a Walgreens
 23 located at 7299 Laguna Blvd, Elk Grove, CA (hereinafter “the Elk Grove Walgreens”),¹⁹
 24 where the Uber gift cards that were redeemed to Uber Account 3 were purchased.

25
 26
 27
 28 ¹⁹ Based upon a review of an open-source mapping application, I know that this Walgreens is
 approximately 3.7 miles from the Elk Grove Residence.

1 According to that surveillance video,²⁰ an individual that investigators believe to be GILL
 2 based upon observed physical characteristics—to include height, weight, approximate age,
 3 and a distinctive beard that is several inches in length, mixed black and grey around the
 4 mouth, but almost completely grey where it terminates below the neckline, was observed
 5 purchasing the Uber gift cards. Based upon review of the video surveillance, the individual
 6 suspected to be GILL paid cash for the gift cards.



15 **H. GILL's Purchase of Uber Gift Cards and Video Surveillance from the**
 16 **Lacey Residence**

17 96. According to records obtained from Uber, gift cards in the amounts of \$100,
 18 \$200, and \$200 were purchased at the Elk Grove Walgreens on April 22, 2022, at 2:14 a.m.
 19 According to Uber records, two of these gift cards were credited to Uber Account 2 at 3:26
 20 a.m. and 3:27 a.m. later that morning. The third \$200 gift card was credited to Uber
 21 Account 1 at 6:22 a.m. on April 22, 2022.

22 97. On April 22, 2022, an individual that investigators believe to be GILL was
 23 observed on surveillance video at the Elk Grove Walgreens purchasing Uber gift cards.
 24 Based on the surveillance video, the individual suspected to be GILL paid cash for the gift
 25 cards.

26

27

28²⁰ For reasons that are unknown to investigators, the timestamp on the Walgreens' surveillance
 video appears to be off (later) by one hour.



98. Investigators believe that the above-noted Uber gift card purchases relate to
 10 a split border trip involving Uber Accounts 1 and 2 on the morning of April 22, 2022.
 11 Specifically, at 5:18 a.m., a ride ordered by Uber Account 2 was picked up from Delta Line
 12 Road in Blaine, WA. This ride terminated at approximately 6:55 a.m. at 12952 4th Avenue
 13 W., Everett, WA, which is in close proximity to the Mariner Park & Ride. At 7:06 a.m., a
 14 ride ordered by Uber Account 1 was picked up close to the location where the border leg
 15 ordered by Uber Account 2 had terminated. The second leg of the trip concluded at 8:21
 16 a.m., approximately .2 miles from the Lacey Residence.

99. At approximately 8:29 a.m., on April 22, 2022, based upon review of remote
 10 video surveillance, investigators know that the garage of the Lacey Residence opened. No
 11 vehicle was in sight at that time. A few seconds after the garage door opened, and as
 12 detailed in the below photo, unidentified individuals—each wearing a backpack—walked
 13

1 into the garage of the Lacey Residence. The individual that was in front of the group
2 appeared to be talking on a cell phone as the group of four entered the garage of the Lacey
3 Residence. At 8:31 a.m., the garage was closed with the four individuals still inside the
4 garage.



12 **I. GILL's Purchase of Uber Gift Cards on April 24, 2022**

13 100. According to records obtained from Uber, gift cards in the amounts of \$100
14 and \$200 were purchased at the Elk Grove Walgreens on April 24, 2022, at 12:32 a.m.
15 According to Uber records, these gift cards were credited to Uber Account 2 at 1:56 a.m.
16 and 1:57 a.m. later that morning.

17 101. Though these two gift cards were credited to Uber Account 2, investigators
18 did not locate a corresponding Uber trip ordered by Uber Account 2 on the morning of
19 April 24, 2022. Rather, investigators located a trip that was ordered by Uber Account 3 that
20 originated in Lynden, WA, at 2:43 a.m., and terminated in Kent, WA, at 5:08 a.m. The
21 second trip-splitting leg of this suspected smuggling event is currently unknown.

22 102. On April 24, 2022, an individual that investigators believe to be GILL was
23 observed on surveillance footage at the Elk Grove Walgreens purchasing Uber gift cards.
24 Based on the surveillance video, the individual suspected to be GILL paid cash for the gift
25 cards.

26 //

27 //

28 //



J. GILL's Statements of Knowledge and Intent

103. During this investigation, and as detailed in this section, law enforcement
10 obtained various recorded statements between GILL and Co-conspirator 2.²¹ During these
11 conversations, GILL acknowledges that he is the individual bringing aliens unlawfully into
12 the United States, arranging their transportation, and receiving payment for such services.

14 104. For example, in a recorded communication with Co-conspirator 2 in January
15 2022, GILL, referring to unidentified co-conspirator(s), stated, “I keep telling them that we
16 need a person to house these people and to drop them off. . . in Canada. Then the entire
17 game is in our hands . . . [t]he entire game.” GILL continued, “[y]es, once they come on
18 this side, in the U.S. then there are so many locations where we can hide them until we find
19 an Uber . . . [t]hink about something for that side and let me know. After that the entire
20 f**king game is in our hands. . . [t]he entire game is in our hands. It’s totally safe.”

21 105. In another recorded communication, also in January 2022, GILL, referring
22 to a U.S. Border Patrol apprehension in Washington State, indicated, “[t]hey know from
23 where these people are f**king coming. One hundred percent (100%).” GILL continued,
24 “[s]o now if we [Indian smuggling organizations, generally] want to do this work then we
25 have to do it from Winnipeg. I spoke to [deleted] in Toronto. He has two drivers who can
26 pick up people from that side.”

27
28²¹ As matter of law, at the time the recorded communications occurred, Co-conspirator 2 was not
a member of the conspiracy.

1 106. Later in the same recorded communication, GILL stated, “Three years ago,
2 we worked with [deleted]. That f**cker didn’t come to pick up the clients and they got
3 arrested. . . [t]his happened three years ago.”

4 107. In yet another January 2022 recorded communication, GILL explained,
5 “[h]oping to set up something for a couple in the next few days. They are clients of
6 [deleted]. The husband cannot walk too much. Want to try one route which is two years
7 old. If they get away from there. That’s an easy route if they get through.”

8 108. Finally, in another January 2022 recorded communication, GILL made clear
9 his fee for smuggling individuals into the United States, “[f]rom now on make it eleven
10 five hundred [\$11,500] because there are a lot of expenses.” GILL continued, “I’ll give
11 you a separate account number, so deposit the money in that account. . . I have to give this
12 money to [deleted]. He is in Canada.”

13 109. This Complaint is being submitted via reliable electronic means. Fed. R.
14 Crim. P. 4.1 & 41(d)(3).

15 //

16 //

17 //

18

19

20

21

22

23

24

25

26

27

28

1 Based on the above facts, I respectfully submit that there is probable cause to
2 believe that Jaspal GILL did knowingly and intentionally Conspire to Transport and Harbor
3 Certain Aliens for Profit, in violation of Title 8, United States Code, Sections
4 1324(a)(1)(A)(v)(I), (ii), and (iii), and 1324(a)(1)(B)(i).

5

6

7

8

9

10

11 Based on the Complaint and Affidavit sworn to before me by telephone, the Court
12 hereby finds that there is probable cause to believe the Defendant committed the offense
13 set forth in the Complaint.

14

 Dated this 20th day of May, 2022.

15

16

17

18

19

20

21

22

23

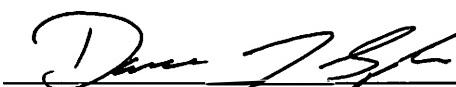
24

25

26

27

28


DAVID J. SPITZER, Complainant
Special Agent, HSI



BRIAN A. TSUCHIDA
United States Magistrate Judge